

2363-140

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHARLOTTE HORTON, as guardian of)	
the estate of Anna R. Richardson,)	
adjudicated disabled person,)	
)	Case No: 07 C 6530
Plaintiff,)	
vs.)	Judge Lindberg
)	
COUNTRY MORTGAGE SERVICES,)	Magistrate Judge Nolan
INC., an Illinois corporation; FREMONT)	
INVESTMENT & LOAN, a California)	
corporation; MORTGAGE ELECTRONIC)	
REGISTRATION SYSTEMS, INC., a)	
Delaware corporation; WELLS FARGO)	
BANK, N.A., a national banking)	
association doing business as America's)	
Servicing Company; and JOHN DOES 1-5,)	
)	
Defendants)	

MOTION FOR EXTENSION TO FILE RESPONSIVE PLEADING
TO PLAINTIFF'S SECOND AMENDED COMPLAINT

NOW COME the Defendants, Wells Fargo Bank, N.A., d/b/a America's Servicing Company ("Wells Fargo"), by and through their attorneys, LITCHFIELD CAVO, LLP, and for their Motion for Extension to file a responsive pleading to Plaintiff's Second Amended Complaint, states as follows:

1. On May 15, 2008, Wells Fargo was served with the Plaintiff's Second Amended Complaint.
2. Wells Fargo has recently retained Litchfield Cavo LLP in the aforementioned matter.

3. Counsel for Plaintiff has no objection to the Emergency Motion for Extension to file a responsive pleading to Plaintiff's Second Amended Complaint and will agree to an order granting Wells Fargo an extension of time to file a responsive pleading.

4. To adequately prepare an answer to the Plaintiff's Second Amended Complaint, Wells Fargo requires time to obtain loan files and other relevant documents to properly evaluate its response to Plaintiff's Second Amended Complaint.

WHEREFORE, Wells Fargo Bank, N.A. d/b/a America's Servicing Company requests that this Honorable Court grant this motion and allow Wells Fargo until July 7, 2008, to file a responsive pleading to Plaintiff's Second Amended Complaint.

LITCHFIELD CAVO, LLP.

Thomas M. Crawford, Esq. (06210832)
LITCHFIELD CAVO, LLP
303 West Madison Street , Suite 300
Chicago, IL 60606-3300
(312) 781-6677
(312) 781-6630 fax

By: /s/ Thomas M. Crawford
Attorneys for the defendants,
Wells Fargo Bank, N.A.
d/b/a America's Servicing Company

CERTIFICATE OF SERVICE

I, the undersigned, being first duly sworn upon oath, depose, and say that I caused to be served the foregoing Emergency Motion for Extension to File Responsive Pleading to Plaintiff's Second Amended Complaint by electronically filing the same with the Clerk for the U.S. District Court for the Northern District of Illinois, Eastern Division, a copy of which was then forwarded to each attorney of record by CM/ECF on the 4th day of June, 2008.

Thomas M. Crawford, Esq. (06210832)
LITCHFIELD CAVO, LLP
303 West Madison Street , Suite 300
Chicago, IL 60606-3300
(312) 781-6677
(312) 781-6630 fax

/s/ Thomas M. Crawford
Attorneys for the defendants,
Wells Fargo Bank, N.A.
d/b/a America's Servicing Company